

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

SECURITIES AND EXCHANGE COMMISSION,

Civil Action No. C08-5502 FDB

Plaintiff,

vs.

FRANCISCO ABELLAN,
VEGA STAR CAPITAL, SL,
EU EQUITY HOLDINGS INC.,
KLO FINANCIAL SERVICES INC.,
GENE HEW-LEN,
NXGEN HOLDINGS, INC., formerly known as
GHL TECHNOLOGIES, INC.,

Defendants,

and

APOLLO CORPORATION,
D&O INTERNATIONAL CORP.,
HALSTON CAPITAL LTD.,
INSIGHT MARKETING &
COMMUNICATIONS INC.,
LACROIX INTERNATIONAL
HOLDINGS LTD.,
MEDIA PACIFIC INC.,
MORTENSEN FINANCIAL LTD.,
OMNI CONSULTING SERVICES INC.,

Relief Defendants.

**APPENDIX OF EXHIBITS TO THE
DECLARATION OF JENNIFER L. SCAFE
IN SUPPORT OF PLAINTIFF'S *EX PARTE*
APPLICATION FOR TEMPORARY
RESTRANDING ORDER AND ORDER TO
SHOW CAUSE RE PRELIMINARY
INJUNCTION**

APPENDIX OF EXHIBITS TO DECLARATION OF JENNIFER L. SCAFE**Exhibit Description** **Tab**

4	Excerpts from the Reporter's Transcript of Testimony by Gene Hew-Len in the Matter of GHL Technologies, Inc., SEC File No. SF-3144, dated 12/5/06	1
6	Excerpts from the Reporter's Transcript of Testimony by Paula A. Argento in the Matter of GHL Technologies, Inc., SEC File No. SF-3144, dated 12/14/07	2
8	8/10/05 e-mail from Francisco Abellan to Hew-Len attaching memorandum re unrestricted securities (SEC Testimony Exhibit 5)	3
10	8/25/05 e-mail from Abellan to Hew-Len re registering corporation in Nevada (SEC Testimony Exhibit 7)	4
11	Definitive Agreement among EVI, Hew-Len, and Vega Star Capital dated 10/31/05 (SEC Testimony Exhibit 14)	5
13	GHL Technologies, Inc. Articles of Incorporation filed 10/17/05 (SEC Testimony Exhibit 8)	6
14	Agreement and Plan of Merger re Peku Manufacturing (SEC Testimony Exhibit 17)	7
16	Bloomberg Finance L.P. printout of historical stock price and volume for GHLT from 12/14/05 to 6/13/06	8
17	6/27/06 e-mail from Abellan to Argento re confidentiality broken (SEC Testimony Exhibit 110)	9
19	GHL Technologies Inc. Confidential Offering Memorandum dated December 2005	10
21	Notice of Acceptance letter from District of Columbia Securities Bureau, Department of Insurance, Securities and Banking to Argento dated 1/5/06	11
22	Amendment to the Definitive Agreement among EVI, Hew-Len, and Vega Star dated 2/6/06 (SEC Testimony Exhibit 16)	12
24	Certificate of Notary Public in Panama dated 6/3/05 regarding EU Equity Holdings, Inc. and attaching the Articles of Incorporation and Power of Attorney	13
26	Notarized document of the Republic of Panama dated 10/26/05 regarding EU and attaching Power of Attorney	14

	<u>Exhibit Description</u>	<u>Tab</u>
1	Notarized document of the Republic of Panama dated 5/25/05 regarding KLO and attaching Articles of Incorporation	15
2	Notarized document of the Republic of Panama dated 10/26/05 regarding KLO and attaching Power of Attorney	16
3	Regus Business Centers Virtual Office Agreement with KLO dated 2/9/06	17
4	Subscription Documents relating to a purchase of GHLT stock by EU dated 2/9/06 (SEC Testimony Exhibit 21)	18
5	Subscription Documents relating to a purchase of GHLT stock by KLO dated 2/9/06 (SEC Testimony Exhibit 22)	19
6	Unanimous Consent re issuance of stock to EU and KLO dated 2/28/06 (SEC Testimony Exhibit 20)	20
7	3/9/06 e-mail from Abellan to Hew-Len re Signed Assignment Agreements for EU and KLO	21
8	Legal opinion letters from Argento to First American Stock Transfer and Registrar re GHLT stock dated 3/13/06	22
9	Securities and Exchange Commission Attestation dated 8/8/08 re GHLT	23
10	New Account Approval Form – Vega Star Capital/Francisco Abellan dated 12/30/05	24
11	Park Financial Statements of Account for Vega Star from 3/1/06 – 5/31/06	25
12	Park Financial Statements of Account for EU from 3/1/06 – 5/31/06	26
13	Park Financial Statements of Account for KLO from 3/1/06 – 5/31/06	27
14	Frontier Bank wire transfer records for the account Emergency Vehicle Installation, the operating subsidiary of GHLT	28
15	Contract Agreement between Valley Offset Printing, Inc. and Vega Star date 4/7/06; Nondisclosure Agreement between Valley Offset and Vega Star dated 4/5/06	29
16	5/2/06 e-mail from Abellan to Doyle Merriman at Valley Offset re wire	30

	<u>Exhibit Description</u>	<u>Tab</u>
3	5/3/06 facsimile cover sheet from Credit Andorra attaching wire transfer record	31
4	Valley Offset ledger record for Vega Star Capital/The Street Stock Report	32
6	4/11/06 e-mail between Abellan and Donya Percival of Valley Offset re Return address for international mailing	33
7	4/4/06 e-mail between Abellan and Merriman of Valley Offset re GPS mailer	34
9	4/5/06 e-mail between Abellan and Robert McDaniel of Valley Offset re Answers & Pricing	35
10	Postage Statements for The Street Stock Report dated 5/16/06 to 5/18/06	36
11	The Street Stock Report produced by Valley Offset	37
12	12/22/05 e-mail from Abellan to Hew-Len re Investor Relations attaching resume of Jesus Rodriguez (SEC Testimony Exhibit 11)	38
14	4/4/06 e-mail from Rodriguez to Hew-Len and Argento re 2005 Results Release attaching draft release and Proposed 45-Day Press Release Program (SEC Testimony Exhibit 98)	39
16	5/22/06 form letter from Abellan to Park Financial re selling 1,000,000 shares of GHLT in Vega Star account	40
17	5/22/06 form letter from Abellan to Park Financial re selling 1,200,000 shares of GHLT in KLO account	41
19	Wire transfer records from EU and KLO accounts at Park Financial to EU and KLO accounts at Credit Andorra dated 4/27/06 - 5/26/2006	42
20	Consent of Defendant Francisco Abellan dated 7/22/08 (not filed)	43
21	Consent of Defendant Vega Star Capital, SL dated 7/22/08 (not filed)	44
23	Affidavit of Francisco Abellan dated 7/22/08; Affidavit of Francisco Abellan dated 5/28/08	45
24	6/19/08 Letter from Sheila K. Soares at U.S. Bank re escrow and attached escrow agreement	46